

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS,

and

AMERICAN FEDERATION OF
TEACHERS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE, *et al.*,

Defendants.

Case No. 1:25-cv-02429-MKV

Declaration of Joseph Slaughter (Witness C)

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN ASSOCIATION OF UNIVERSITY
PROFESSORS,

and

AMERICAN FEDERATION OF TEACHERS,

Plaintiffs,

Case No.1:25-cv-02429-MKV

v.

UNITED STATES DEPARTMENT OF JUSTICE. et al.,

Defendants.

Declaration of Joseph R. Slaughter

I, Joseph R. Slaughter, declare as follows:

1. I am an Associate Professor of English and Comparative Literature at Columbia. I am also the Director of the Institute for the Study of Human Rights (“ISHR”) at Columbia. I have been a member of the Columbia faculty since 2000.
2. I have a PhD in English, specializing in Ethnic and Third World Literatures, from the University of Texas at Austin. My research and teaching explore ways in which literature intersects with social justice, human rights, and international law.
3. The ISHR offers students an interdisciplinary human rights education, fosters innovative academic research, and offers its expertise in capacity building to human rights leaders, organizations, and universities around the world. Students and faculty at ISHR regularly engage in difficult research and discussion involving fraught political topics including using history in

genocide prevention, indigenous peoples' rights, and a broad range of international human rights abuses.

4. Faculty regularly teach courses related to armed conflict, minority rights, and international law, including in areas such as Israel and Palestine. For example, recent course offerings include "War, Gender and Migration," "Refugees, Forced Migration, and Displacement," "The Law of Genocide," "Humanitarian Law and Human Rights in Global Challenges," "Gender-Based Violence and Human Rights," and "Religion and Human Rights."

5. I am a member of the American Association of University Professors ("AAUP") and the American Federation of Teachers ("AFT").

6. I am over the age of 18 and competent to testify as to the matters set forth in this affidavit based on my own personal knowledge. I am aware that the current administration has taken a series of actions targeting Columbia. In particular, I am aware that on February 3rd, 2025, the U.S. Department of Education announced an investigation into Columbia. I am aware that on February 28, the federal Task Force to Combat Anti-Semitism announced that it would visit the Columbia campus. I am aware that on March 3, 2025, several federal agencies announced that they would review funding to Columbia. I am aware that on March 7, 2025, several federal agencies announced \$400 million in grant cancellations to Columbia, and stated that that "[t]hese cancellations represent the first round of action and additional cancellations are expected to follow." Most recently, I am aware that on March 13, 2025, officials from the General Services Administration (GSA), the Department of Health and Human Services (HHS), and the Department of Education (ED) sent a letter to Columbia that was made public, and demanded that Columbia immediately take a long list of actions as a precondition of further negotiations regarding federal

funding. I am aware that Columbia announced the adoption of numerous of these policy demands on March 21, 2025.

7. It is my perception and belief that the March 7 funding cancellation and March 13 policy demands have already had a substantial impact in terms of chilling speech on campus and that the challenged actions are already stifling classroom discussion and participation, event programming and external speaker visits, as well as research work by students and faculty.

8. Students have grown scared to speak in class, even on topics that are only tangentially related to current controversial issues. Open discussion in seminars has already been chilled, and students have said they are concerned about being surreptitiously recorded by others or even speaking first when a question is posed to the class. One student from Eastern Europe compared the current chill in Columbia classrooms to their experience studying in Russia. Students have told me that other professors do not talk about contemporary events occurring on campus or in the U.S. and have asked students not to talk about them in class. Attendance is down in many classes, and some students have confided that they are scared to come to campus and to class for fear of surveillance or worse. Many students have told me that they are self-censoring in their courses, concerned that they might unwittingly say something that could run afoul of the administration. Multiple students have said that they have changed a research topic for a seminar paper or a thesis out of fear.


9. Numerous faculty colleagues have also expressed fears of speaking openly in their classrooms, for fear of running afoul of the administration or of the University trying to placate the administration. Faculty now routinely express fear of being surreptitiously recorded and/or reported by students for saying something that might be misrepresented as offensive in the current climate. A number of faculty, students, and scholars on campus have already been recorded

secretly by students or university staff. Those recordings have been shared with members of Congress and the administration, recirculated in doxing posts on social media, fed to unscrupulous news outlets, and used to file spurious claims of harassment to university administrators. Emails and course postings from classes have similarly been used, and faculty have made decisions to restrict communications with students or to protect student privacy and welfare by disabling online group conversations through course websites. For example, I have restricted access to course materials that in the past I always opened to the entire university community, and I have deleted old course materials in an effort to protect students from unwarranted interference or scrutiny in their education. Departments and Institutes have cancelled events that might be perceived in the current climate as controversial, and faculty and outside scholars have cancelled or substantially altered topics for scholarly talks out of fear. Events that once would have been open to the public are now often limited to invitation-only or strict preregistration.

10. I am deeply concerned that in the future my colleagues, students, or I will be targeted for research work disfavored by the administration or for statements made in the course of regular teaching or routine academic discussions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: 31 March 2025

Signed: 
Joseph R. Slaughter
Associate Professor of English
& Comparative Literature